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8  
9 **UNITED STATES DISTRICT COURT**

10  
11 **DISTRICT OF NEVADA**

12 JOHN and JANE DOE I, Guardians Ad Litem  
13 for JOANN DOE I, a minor, individually and  
on behalf of all those similarly situated, and  
JOHN and JANE DOE II, Guardians Ad Litem  
for JOANN DOE II, a minor, individually and  
on behalf of all those similarly situated;

14 Plaintiffs,  
15 vs.

16 JEREMIAH MAZO; CLARK COUNTY  
17 SCHOOL DISTRICT; DOES 1 through 20;  
DOE 1 through 20; ROE CORPORATIONS 1  
through 20;

18 Defendants.

19 Case No. 2:16-cv-00239-APG-PAL

**[PROPOSED] STIPULATION AND  
ORDER TO CONTINUE DISCOVERY**

**(SECOND REQUEST)**

20 The parties have reached an agreement to attend mediation and to delay the limited  
21 remaining depositions in this case until after the mediation has taken place. In light of this  
22 agreement, Plaintiffs, JOHN and JANE DOE I, GUARDIANS AD LITEM FOR JOANN DOE I, A  
MINOR AND JOHN AND JANE DOE II, GUARDIANS AD LITEM FOR JOANN DOE II, A  
MINOR (collectively, "Plaintiffs"), Defendant CLARK COUNTY SCHOOL DISTRICT ("CCSD")  
23 and Defendant JEREMIAH MAZO, by and through their respective counsel of record, hereby  
24 jointly submit this proposed stipulation extending certain case deadlines for the approval of the  
25 Court.

## STIPULATION

Pursuant to Local Rule 6-1, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, CCSD, and Jeremiah Mazo that the current deadlines be extended in the above referenced matter.

The current deadlines are as follows:

January 29, 2018

## Dispositive Motions:

February 28, 2018

**Proposed Joint Pretrial Order:**

March 28, 2018 or 30 days after  
the Court rules on any  
dispositive motions.

## I. Background

This case was filed on February 5, 2016, alleging abuse of students by a former CCSD teacher, Jeremiah Mazo, and bringing claims under Title IX against CCSD and state tort claims against all defendants. (Doc. 1). Plaintiffs filed a First Amended Class Action Complaint on March 1, 2017. (Doc. 39). CCSD filed its Answer to the First Amended Class Action Complaint on March 16, 2017, and asserted cross-claims against Defendant Mr. Mazo. (Doc. 43). Mr. Mazo filed an Answer to the Plaintiffs' First Amended Class Action Complaint on June 2, 2017 and his answer to CCSD's Cross-Claims on July 6, 2017 (Doc. Nos. 61, 67).

## **II. Discovery Completed**

**Plaintiffs have served Defendant Clark County School District with the following discovery to date:**

1. Plaintiffs' Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 10/10/2016;
  2. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's First set of Request of Production of Documents served 10/27/16:

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- 1           3. Plaintiffs' First Supplement to Early Case Conference List of Documents and
- 2           Witnesses Pursuant to FRCP 26(F) served 12/14/2016;
- 3           4. Plaintiff Jane Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark
- 4           County School District's First set of Interrogatories served 12/14/2016;
- 5           5. Plaintiff Joann Doe I's Responses to Clark County School District's First set of
- 6           Interrogatories served 12/14/2016;
- 7           6. Plaintiff John Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark
- 8           County School District's First set of Interrogatories served 12/14/2016;
- 9           7. Plaintiffs John and Jane Doe I as Guardians ad Litem for Joann Doe I's Responses to
- 10           Clark County School District's First set of Request for Production of Documents
- 11           served 12/14/2016;
- 12           8. Plaintiff Jane Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark
- 13           County School District's First set of Interrogatories served 12/14/2016;
- 14           9. Plaintiff Joann Doe II's Responses to Clark County School District's First set of
- 15           Interrogatories served 12/14/2016;
- 16           10. Plaintiff John Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark
- 17           County School District's First set of Interrogatories served 12/14/2016;
- 18           11. Plaintiffs John and Jane Doe II as Guardians ad Litem for Joann Doe II's Responses
- 19           to Clark County School District's First set of Request for Production of Documents
- 20           served 12/14/2016;
- 21           12. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
- 22           Jane Doe II, Guardians ad Litem for Joann Doe II's Second set of Requests for
- 23           Production of Documents served 01/18/2017;
- 24           13. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 25           Requests for Admission served 01/18/2017;
- 26           14. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 27           Interrogatories served 01/18/2017;

15. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of  
2 Interrogatories served 01/18/2017;
16. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of  
4 Requests for Admission served 01/18/2017;
17. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and  
6 Jane Doe II, Guardians ad Litem for Joann Doe II's Third set of Requests for  
7 Production of Documents served 01/20/2017;
18. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's Second set of  
9 Interrogatories served 01/23/2017;
19. Plaintiffs' Second Supplement to Early Case Conference List of Documents and  
11 Witnesses Pursuant to FRCP 26(F) served 02/10/17;
20. Plaintiff Joann Doe II's Supplemental Responses to CCSD's First set of  
13 Interrogatories served on 03/01/17;
21. Plaintiff Joann Doe I's Supplemental Responses to CCSD's First set of  
15 Interrogatories served on 03/01/17;
22. Plaintiffs' Third Supplement to Early Case Conference List of Documents and  
17 Witnesses Pursuant to FRCP 26(F) served 05/31/17;
23. Plaintiffs' Fourth Supplement to Early Case Conference List of Documents and  
19 Witnesses Pursuant to FRCP 26(F) served 07/07/17;
24. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Third Set of  
21 Interrogatories to CCSD served 07/11/17;
25. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Fourth Set of  
23 Interrogatories to CCSD served 08/22/17;
26. Plaintiffs' Fifth Supplement to Early Case Conference List of Documents and  
25 Witnesses Pursuant to FRCP 26(F) served 10/11/17;
27. Plaintiffs' Expert Designation Pursuant to FRCP 26(A)(2) served 10/13/17.

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1           **Defendant Clark County School District has served Plaintiffs with the following**  
2 **discovery to date:**

- 3       1. CCSD's Initial Disclosures served 10/05/2016;
- 4       2. CCSD's First set of Interrogatories to Plaintiff Jane Doe I, as Guardian ad Litem for  
5           Joann Doe I served 11/14/2016;
- 6       3. CCSD's First set of Interrogatories to Plaintiff Joann Doe I served 11/14/2016;
- 7       4. CCSD's First set of Interrogatories to Plaintiff John Doe I, as Guardian ad Litem for  
8           Joann Doe I served 11/14/2016;
- 9       5. CCSD's First set of Requests for Production of Documents to Plaintiffs John and  
10          Jane Doe I, as Guardians ad Litem for Joann Doe I served 11/14/2016;
- 11       6. CCSD's First set of Interrogatories to Plaintiff Jane Doe II, as Guardian ad Litem for  
12          Joann Doe II served 11/14/2016;
- 13       7. CCSD's First set of Interrogatories to Plaintiff Joann Doe II served 11/14/2016;
- 14       8. CCSD's First set of Interrogatories to Plaintiff John Doe II, as Guardian ad Litem for  
15          Joann Doe II served 11/14/2016;
- 16       9. CCSD's First set of Requests for Production of Documents to Plaintiffs John and  
17          Jane Doe II, as Guardians ad Litem for Joann Doe II served 11/14/2016;
- 18       10. CCSD's Responses to Plaintiffs' First set of Requests for Production of Documents  
19          to the Clark County School District served 12/01/2016;
- 20       11. CCSD's First Supplemental Disclosures served 12/01/2016;
- 21       12. CCSD's Second Supplemental Disclosures served 02/17/17;
- 22       13. CCSD's Third Supplemental Disclosures served 02/24/17;
- 23       14. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a  
24          Minor's First Set of Requests for Admission to CCSD served 02/24/17;
- 25       15. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a  
26          Minor's First Set of Requests for Admission to CCSD served 02/24/17;

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16. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a  
2 Minor's First set of Interrogatories to CCSD served 02/27/17;
17. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a  
4 Minor's First set of Interrogatories to CCSD served 02/27/17;
18. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a  
6 Minor's Second set of Interrogatories to CCSD served 03/10/17;
19. CCSD's Fourth Supplemental Disclosures Pursuant to FRCP 26(a)(1) and Pursuant  
8 to March 6, 2017 Order served 04/05/17;
20. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a  
10 Minor's Third set of Interrogatories to CCSD served 07/24/17;
21. CCSD's Fourth Supplemental Disclosures served 08/21/17;
22. CCSD's Responses to Plaintiff Jon Doe I, as Guardian ad Litem for Joann Doe I, a  
13 Minor's Fourth set of Interrogatories to CCSD served 09/21/17;
23. CCSD's Sixth Supplemental Disclosures served 09/01/2017;
24. CCSD's Seventh Supplemental Disclosures served 10/13/17;
25. CCSD's Expert Witness Disclosures served 10/13/17.

17 **The following depositions have been completed to date:**

- 18 1. Ulandra Barnett
- 19 2. Ivy Burns
- 20 3. Sylvia Glass
- 21 4. Jennifer Mattiello
- 22 5. Nestor Mattiello
- 23 6. Jon Okazaki
- 24 7. Julia Pettit
- 25 8. Kristopher Pettit
- 26 9. Christine Prosen
- 27 10. Darrin Puana

11. Billie Rayford

2 **III. Discovery That Remains to be Completed**

- 3 1. Deposition of Defendant Jeremy Mazo;  
4 2. Depositions of Plaintiffs Joann Doe I and Joann Doe II;<sup>1</sup> and  
5 3. Expert Depositions.

6 **IV. Basis for Extension**

7 The parties request this extension to allow the depositions of Joann Doe I, Joann Doe II,  
8 Jeremy Mazo, and the parties' expert witnesses to take place after a mediation, which the parties are  
9 currently seeking to schedule for March. The parties have diligently engaged in discovery and  
10 believe that allowing these final depositions to take place following the mediation will further  
11 mediation discussions. The parties have agreed on a mediator. However, the agreed upon mediator  
12 has limited availability and the parties are unable to schedule the mediation until March or April of  
13 2018. The parties are committed to completing the mediation by April 13, 2018, if at all possible.  
14 Accordingly, the parties request an extension to allow for the foregoing outstanding discovery to be  
15 completed 60 days from the anticipated completion of mediation (April 13, 2018) as detailed below.

16 **V. Proposed Modification**

17 Based on the foregoing, the parties jointly seek a modification of the current deadlines as  
18 follows:

19 1. **Current Deadlines:**

20 **Discovery Cut-Off Date:** **January 29, 2018**

21 **Dispositive Motions:** **February 28, 2018**

22 **Proposed Joint Pretrial Order:**

23 **March 28, 2018 or 30 days  
after the Court rules on any  
dispositive motions.**

24 2. **Proposed Deadlines:**

25 **Discovery Cut-Off Date:** **June 12, 2018**

26 **Dispositive Motions:** **July 12, 2018**

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<sup>1</sup> Defendants have expressed a desire to conduct the depositions of Joann Doe I and Joann Doe II, who are both minors.  
28 Plaintiffs hereby reserve the right to object to such depositions from going forward.

## **Proposed Joint Pretrial Order:**

**August 10, 2018 or 30 days after the Court rules on any dispositive motions.**

3. This request is made in good faith and not for the purposes of delay.

## **IT IS SO STIPULATED.**

Dated this 28th day of December, 2017.

Dated this 28th day of December, 2017.

**GREENBERG TRAURIG, LLP**

EGLET PRINCE

/s/ Kara B. Hendricks

/s/ Artemus W. Ham

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-and-

Dated this 28th day of December, 2017.

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## ORDER

**IT IS HEREBY ORDERED.**

DATED this 23rd day of February, 2017.

Terry A. Teer  
UNITED STATES MAGISTRATE JUDGE